

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**FELICIA FRANCIS, individually and on behalf of all others similarly situated,**

**Plaintiff,**

**-against-**

## **TARGET CORPORATION, and TARGET GENERAL MERCHANDISE, INC.**

## Defendants.

**Case No: 20 Civ. 05986**  
**(CBA)(VMS)**

## **NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE**

Plaintiff, through her undersigned counsel, pursuant to Fed. R. Civ. P. 41(a), files this Notice of Voluntary Dismissal without Prejudice and states as follows:

1. Federal Rule of Civil Procedure 41(a) allows a plaintiff to voluntarily dismiss an action without leave of Court prior to the filing of an answer or a motion for summary judgment.
2. Here, Defendants have not filed an answer to the Complaint and have not made any motion for summary judgment.

WHEREFORE, Plaintiff respectfully requests that the Court to dismiss the above action without prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i).

Dated: New York, New York  
January 4, 2021

Respectfully submitted,

/s/ Brian S. Schaffer

Brian S. Schaffer

## **FITAPELLI & SCHAFFER, LLP**

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New York, NY 10005

/s/ Carol Bagley Amon  
Hon. Carol Bagley Amon, U.S.D.J.